

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

BRIDGET Y. TAYLOR)	
)	CV. NO. 2:07CV404-MHT
v.)	
)	
UNITED STATES OF AMERICA)	

MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND TO
PETITIONER'S MOTION TO VACATE, CORRECT, OR SET ASIDE SENTENCE

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, requesting an extension of time in which to respond to Petitioner's Motion to Vacate, Correct, or Set Aside Sentence pursuant to 28 U.S.C. § 2255, and in support of its request, states as follows:

1. The Government's response to Taylor's petition is due June 11, 2007. This Court has granted Kevin Butler through May 30, 2007, to file his affidavit regarding his representation of Petitioner in the underlying criminal case.

2. On May 29, 2007, the undersigned Assistant United States Attorney unsealed a multi-defendant 20-count Indictment charging numerous serious violations of the federal criminal code. As indicted individuals are arrested, the undersigned expects to be preparing for, and litigating, detention motions and hearings.

3. In addition, the undersigned is currently preparing cases to present to the June 12, 2007, Grand Jury.

4. Finally, the undersigned is also preparing for the physical move of the United States Attorney's Office scheduled for the weekend of June 15, 2007. Preparations for the move have been scheduled for the week starting June 11th.

5. Therefore, the undersigned requests that the deadline for the United States' response be extended thirty (30) days beyond the date of June 11, 2007, to July 11, 2007.

Respectfully submitted on this the 30th day of May, 2007.

LEURA G. CANARY
UNITED STATES ATTORNEY

/s/ Verne H. Speirs
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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participant: Bridget Taylor, Julia Tutweiller Prison, 224401, Dorm C, 8966 U.S. Highway 231, Wetumpka, Alabama, 36092.

Respectfully submitted,

LEURA G. CANARY
UNITED STATES ATTORNEY

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